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March 14, 2019

Hon. George B. Daniels  
U.S. District Court  
500 Pearl Street, Room 1310  
New York, NY. 10007

RE: Opposition to Defendants' Motion to Adjourn Pre-trial Conference 1:18-cv-4363

Dear Judge Daniels:

This Office represents The Estate of Alkiviades Meimaris and Helen Meimaris. We write in opposition to Defendants' motion to yet again adjourn the pre-trial conference scheduled for March 20, 2019. The Initial Pre-Trial Conference in this matter was originally scheduled for August 1, 2018, but was adjourned three times: first to October 2, 2018, then to January 9, 2019, and then to March 20, 2019.

This matter has been referred to Magistrate Judge Moses for "general pre-trial management, including dispositive motions." (ECF No. 46.) Since the referral, we have opposed all of Defendants' motions to dismiss the Third Amended Complaint. These oppositions are currently sub judice before Judge Moses. As is clearly set forth in those submissions (ECF Nos. 79, 81 & 83), there are absolutely no significant, substantive deficiencies with regard to the Third Amended Complaint that cannot be cured by amendment. Further, Plaintiffs also oppose the Defendants' motion for a stay of discovery pending resolution of the motions. It is immaterial whether the foreign Defendants have yet to be served. The wrongdoings of these Defendants have no bearing on the wrongdoing of the foreign Defendants. It could take over a year for the foreign Defendants to be served and therefore, in the interests of efficiency and justice, discovery should not be stayed.

For the reasons set forth above, we respectfully request that the Court deny Defendants' motion to adjourn the pre-trial conference and deny their motion to stay discovery. Thank you for your attention to this matter.

Respectfully,

Alkistis G. Meimaris, Esq.

/s/ Alkistis G. Meimaris

CC: Counsel of Record via ECF